

## Appendix B

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### Avoidance and Minimization Measures



# Avoidance and Minimization Measures

The following sections describe the established design and construction practices that WSDOT will include to avoid or minimize effects to the various environmental resources during both the construction and operation phases of the project.

## Project Measures to Avoid or Minimize Effects During Construction

Design elements, such as modifications to boundaries of areas that can be affected, have been incorporated into the project specifications, construction plans, and procedures, to help avoid or minimize most potential construction impacts. When appropriate, monitoring will be conducted to ensure that these design and construction measures are effective.

### Measures for Geology, Soils, and Groundwater

- WSDOT will prepare and implement a Temporary Erosion and Sedimentation Control (TESC) plan consisting of operational and structural measures to control the transport of sediment. Operational measures include removing mud and dirt from trucks before they leave the site, covering fill stockpiles or disturbed areas, and avoiding unnecessary vegetation clearing. Structural measures are temporary features used to reduce the transport of sediment, such as silt fences and sediment traps.
- WSDOT will reduce degradation of moisture-sensitive soils by limiting major earthwork to the drier, late spring through early fall construction season; by maintaining proper surface drainage to avoid ponding of surface water or groundwater; by minimizing ground disturbance through limiting the use of heavy equipment, limiting turns, and/or not tracking directly on the subgrade; and by covering the final subgrade elevation with a working mat of crushed rock and/or geotextile for protection. Mixing a soil admix such as cement into the subgrade may also add strength and stabilize the ground.
- WSDOT will determine acceptable limits for off-site construction-related ground vibration before construction begins and demonstrate that off-site ground vibrations are within the limits set for the project through the use of vibration-monitoring equipment.
- WSDOT will identify areas subject to shaking from a large earthquake and will mitigate risks using ground modifications or other procedures identified in the WSDOT Geotechnical Design Manual.
- WSDOT will implement construction procedures identified in the geotechnical investigation to maintain or enhance slope stability in areas potentially underlain by landslide-prone soils.
- WSDOT will protect the Kelsey Creek aquifer from contamination by construction-related spills by development and implementation of BMPs and a Spill Prevention Control and

Countermeasures plan (SPCC). The SPCC plan will specifically address fuel spills from vehicles and from spills of other chemicals commonly transported over I-405. Spill response equipment will be located at regular and specified intervals within the project area for minimizing countermeasure response times.

- WSDOT will ensure only clean fill is imported and placed for the project and will require documentation for fill brought onto the site from the supplier certifying that the fill does not exceed Washington State soil cleanup standards. If documentation is not available, testing of imported fill soils will be required prior to placement. Suspect soils encountered during project construction will be tested and, where necessary, removed from the site and disposed of in accordance with Washington State regulations.
- WSDOT will identify and develop staging areas for equipment repair and maintenance away from all drainage courses. Washout from concrete trucks will not be dumped into storm drains or onto soil or pavement that carries stormwater runoff. A wash down area for equipment and concrete trucks will be designated and the use of thinners and solvents to wash oil, grease, or similar substances from heavy machinery or machine parts will be prohibited.
- WSDOT will obtain a NPDES (National Pollutant Discharge Elimination System) permit and will conduct a regular program of testing and lab work to ensure that water encountered during construction meets the water quality standards specified in the NPDES permit.
- WSDOT will meet the NPDES water quality standards prior to the discharge of the encountered water to a surface water body, such as Kelsey Creek. If necessary, water quality will be improved, such as by using sediment ponds to allow sediment to settle out prior to discharge.
- If it is necessary to install seepage drains to control seepage for retaining walls and fill embankments, WSDOT will include special provisions in the design to discharge drain flow back into affected areas, including wetlands.

## Measures for Water Quality

In addition to measures for geology, soils, groundwater, and for hazardous materials that are protective of water quality, the following measures would be implemented for water quality.

- WSDOT will identify and develop staging areas for equipment repair and maintenance away from all drainage courses.
- Washout from concrete trucks will not be dumped into storm drains or onto soil or pavement that carries stormwater runoff.
- Thinners and solvents will not be used to wash oil, grease, or similar substances from heavy machinery or machine parts.
- WSDOT will designate a wash down area for equipment and concrete trucks.

## Measures for Wetlands

- WSDOT will protect, preserve, and enhance wetlands in the project area during the planning, construction, and operation of transportation facilities and projects consistent with USDOT Order 5660.1A, Executive Order 11990, and Governor's Executive Orders EO 89-10 and EO 90-04.
- WSDOT's project-level design and environmental review has included avoidance, minimization, restoration, and compensation of wetlands. WSDOT will implement these measures prior to or concurrent with adverse effects on wetlands, to reduce temporal losses of wetland functions.
- WSDOT will follow guidance contained in the wetlands section of the WSDOT Environmental Procedures Manual (WSDOT 2004a), which outlines the issues and actions to be addressed prior to authorizing work that could affect wetlands.
- WSDOT will use high-visibility fencing to clearly mark wetlands to be avoided in the construction area.

## Measures for Upland Vegetation and Wildlife

- WSDOT will ensure mitigation measures established in the I-405 Corridor EIS will be implemented on the Bellevue Nickel Improvement Project.
- WSDOT will prepare and implement a revegetation plan. In addition, areas with mixed forest will not be removed for temporary use (i.e., construction staging). If an area of mixed forest must be removed for roadway construction, it will be replaced with plantings of native tree and shrub species within the affected area.
- WSDOT will adhere to project conditions identified in the Biological Assessment and agency concurrence letters.
- WSDOT will limit construction activity to a relatively small area immediately adjacent to the existing roadway to minimize vegetation clearing and leave as many trees as possible.

## Measures for Fisheries and Aquatic Resources

- WSDOT will implement construction BMPs (such as silt fencing or sedimentation ponds) to avoid disturbing sensitive areas during the development and use of any staging areas, access roads, and turnouts associated with resurfacing activities.
- WSDOT will not allow in-water work to occur except during seasonal work windows established to protect fish.
- WSDOT will require that all stormwater treatment wetland/detention facilities are sited and constructed at a sufficient distance from named and unnamed streams so no grading or filling in the streams or the streamside zones will be required.

## Measures for Air Quality

- WSDOT will require preparation and implementation of a Fugitive Dust Control Plan in accordance with the Memorandum of Agreement between WSDOT and PSCAA Regarding Control of Fugitive Dust from Construction Projects (October 1999).
- During dry weather, exposed soil will be sprayed with water to reduce emissions of and deposition of particulate matter (PM<sub>10</sub>).
- WSDOT will provide adequate freeboard (space from the top of the material to the top of the truck), cover truckloads, and, in dry weather, wet materials in trucks to reduce emission of and deposition of particulate matter during transport.
- WSDOT use wheel washers to remove particulate matter that would otherwise be carried offsite by vehicles to decrease deposition of particulate matter on area roadways.
- WSDOT will remove particulate matter deposited on public roads to reduce mud on area roadways.
- WSDOT will cover or spray with water any dirt, gravel, and debris piles during periods of high wind when the stockpiles are not in use to control dust and transmissions of particulate matter.
- WSDOT will route and schedule construction trucks to reduce travel delays and unnecessary fuel consumption during peak travel times, and therefore reduce secondary air quality impacts (i.e. emissions of carbon monoxide and nitrogen oxides) that result when vehicles slow down to wait for construction trucks.

## Measures for Noise

- Noise berms and barriers will be erected prior to other construction activities to provide noise shielding.
- The noisiest construction activities, such as pile driving, will be limited to between 7 AM and 10 PM to reduce construction noise levels during sensitive nighttime hours.
- Construction equipment engines will be equipped with adequate mufflers, intake silencers, and engine enclosures.
- Construction equipment will be turned off during prolonged periods of nonuse to eliminate noise.
- All equipment will be maintained appropriately and equipment operators will be trained in good practices to reduce noise levels.
- Stationary equipment will be stored away from receiving properties to decrease noise.
- Temporary noise barriers or curtains will be constructed around stationary equipment that must be located close to residences.
- Resilient bed liners will be required in dump trucks to be loaded on site during nighttime hours.

- WSDOT use Occupational Safety and Health Administration (OSHA)-approved ambient sound-sensing backup alarms that would reduce disturbances during quieter periods.

## Measures for Hazardous Materials

### Known or Suspected Contamination within the Build Alternative Right of Way

- WSDOT will prepare an SPCC plan that provides specific guidance for managing contaminated media that may be encountered within the right of way (ROW).
- WSDOT may be responsible for remediation and monitoring of any contaminated properties acquired for this project. WSDOT will further evaluate the identified properties before acquisition or construction occurs. Contamination in soils will be evaluated relative to the Model Toxics Control Act (MTCA).
- If WSDOT encounters an underground storage tank (UST) within the ROW, WSDOT will assume cleanup liability for the appropriate decommissioning and removal of USTs. If this occurs, WSDOT will follow all applicable rules and regulations associated with UST removal activities.
- WSDOT will conduct thorough asbestos-containing material/lead paint building surveys by an Asbestos Hazard Emergency Response Act (AHERA)-certified inspector on all property structures acquired or demolished. WSDOT will properly remove and dispose of all asbestos-containing material/lead-based paint in accordance with applicable rules and regulations.
- Construction waste material such as concrete or other harmful materials will be disposed of at approved sites in accordance with Sections 2-01, 2-02, and 2-03 of the WSDOT Standard Specifications.
- WSDOT may acquire the responsibility for cleanup of any soil or groundwater contamination encountered during construction (that must be removed from the project limits) within WSDOT ROW. Contamination will be evaluated relative to Model Toxics Control Act (MTCA) cleanup levels.
- WSDOT will consider entering into pre-purchaser agreements for purpose of indemnifying itself against acquiring the responsibility for any long-term cleanup and monitoring costs.
- All regulatory conditions imposed at contaminated properties (e.g., Consent Decree) associated with construction will be met. These conditions could include ensuring that the surrounding properties and population are not exposed to the contaminants on the site: i.e., WSDOT will ensure that the site is properly contained during construction so that contaminants do not migrate offsite, thereby protecting the health and safety of all on-site personnel during work at the site.

### Known or Suspected Contamination Outside of the Right of Way

- Contaminated groundwater originating from properties located up-gradient of the ROW could migrate to the project area. WSDOT generally will not incur liability for groundwater contamination that has migrated into the project footprint as long as the agency does not

acquire the source of the contamination. However, WSDOT will manage the contaminated media in accordance with all applicable rules and regulations.

### Unknown Contamination

- If unknown contamination is discovered during construction, WSDOT will follow the SPCCP as well as all appropriate regulations.

### Worker and Public Health and Safety and other Regulatory Requirements

The WSDOT will comply with the following regulations and agreements:

- State Dangerous Waste Regulations (Chapter 173-303 WAC);
- Safety Standards for Construction Work (Chapter 296-155 WAC);
- National Emission Standards for Hazardous Air Pollutants (CFR, Title 40, Volume 5, Parts 61 to 71);
- General Occupational Health Standards (Chapter 296-62 WAC); and
- Implementing Agreement between Ecology and WSDOT Concerning Hazardous Waste Management (April 1993).

### Hazardous Materials Spills During Construction

- WSDOT will prepare and implement a SPCCP to minimize or avoid effects on human health, soil, surface water and groundwater.

### Measures for Traffic and Transportation

- WSDOT will coordinate with local agencies and other projects to prepare and implement a Traffic Management Plan (TMP) prior to making any changes to the traffic flow or lane closures. WSDOT will inform the public, school districts, emergency service providers, and transit agencies of the changes ahead of time through a public information process. Pedestrian and bicycle circulation will be maintained as much as possible during construction.
- Prior to and during construction, WSDOT will implement strategies to manage the demand on transportation infrastructure. These transportation demand management strategies will form an important part of the construction management program and will be aimed at increasing public awareness and participation in HOV travel. The major focus will be on expanding vanpooling and van-share opportunities. Other elements of the transportation demand management plan may include:
  - increased HOV awareness and public information, and
  - work-based support and incentives.



## Measures for Visual Quality

- WSDOT will follow the I-405 Urban Design Criteria. Where the local terrain and placement of light poles allow, the WSDOT will reduce light and glare effects by shielding roadway lighting and using downcast lighting so light sources will not be directly visible from residential areas and local streets.
- WSDOT will restore (revegetate) construction areas in phases rather than waiting for the entire project to be completed.

## Measures for Neighborhoods, Businesses, Public Services and Utilities

- WSDOT will prepare and implement a transportation management plan (TMP). If local streets must be temporarily closed during construction, WSDOT will provide detour routes clearly marked with signs.
- WSDOT will coordinate with school districts before construction.
- WSDOT will implement and coordinate the TMP with all emergency services prior to any construction activity.
- WSDOT will coordinate with utility providers prior to construction to identify conflicts and resolve the conflicts prior to or during construction. Potential utility conflicts within WSDOT ROW will be relocated at the utility's expense prior to contract award.
- WSDOT will prepare a consolidated utility plan consisting of key elements such as existing locations, potential temporary locations and potential new locations for utilities; sequence and coordinated schedules for utility work; and detailed descriptions of any service disruptions. This plan will be reviewed by and discussed with affected utility providers prior to the start of construction.
- WSDOT will field verify the exact locations and depths of underground utilities prior to construction.
- WSDOT will notify neighborhoods of utility interruptions by providing a scheduled of construction activities in those areas.
- WSDOT will coordinate with utility franchise holders and provide them with project schedules to minimize the effects of utility relocations (for example, equipment procurement times, relocation ahead of construction, etc.)
- WSDOT will notify and coordinate with fire departments for water line relocations that may affect water supply for fire suppression, and establish alternative supply lines prior to any breaks in service; and to ensure that fire departments can handle all calls during construction periods and to alleviate the potential for increased response times.
- WSDOT will notify and coordinate with police departments to implement crime prevention principles and to ensure that they have adequate staffing to provide traffic and pedestrian control.

- WSDOT will maintain access to businesses throughout the construction period through careful planning of construction activities and an awareness of the needs to provide adjacent properties with reasonable access during business hours. As part of construction management, WSDOT will prepare access measures. WSDOT will make provisions for posting appropriate signs to communicate the necessary information to potential customers.
- WSDOT will keep daytime street closures to a minimum to provide access for businesses during regular business hours.

## Measures for Cultural Resources

- WSDOT will prepare an Unanticipated Discovery Plan for the project that WSDOT will follow. This will avoid or minimize unanticipated effects to historic, cultural, and archaeological resources.

## Project Measures to Avoid or Minimize Effects During Project Operation

The following sections describe the measures that WSDOT will implement during project operation.

### Measures for Surface Waters and Water Quality

- WSDOT will follow the Highway Runoff Manual for both the design and implementation of stormwater facilities. WSDOT is not required to manage flow where drainage is directly to Mercer Slough. Where drainage is to a tributary to Mercer Slough, WSDOT will construct a stormwater management system that does provide flow control.

### Measures for Fisheries and Aquatic Resources

- WSDOT will compensate for adverse effects to fish habitat and aquatic resources by providing in-kind mitigation. This in-kind mitigation will take the form of on-site, off-site, or a combination of on- and off-site mitigation.
- Off-site mitigation could include planting native riparian vegetation outside of the study area in areas where restoring native riparian buffers may have a greater benefit to fish and aquatic species. Mitigation could be concentrated along streams with high fish use where important stream processes and functions related to riparian buffers (for example, large woody debris [LWD] recruitment levels, litter fall, and bank stabilization) are impaired.
- On-site/off-site mitigation could include installing in-stream habitat features (for example, boulders or LWD) in the streambed downstream of the project footprint to increase the habitat complexity of the affected waterbody.

- Ongoing maintenance (during and post-construction) of stormwater treatment and detention facilities by WSDOT will not include the application of any chemical weed control agents (e.g., herbicides).

## Measures for Upland Vegetation and Wildlife

- WSDOT will replace areas of mixed forest that will be permanently removed for roadway construction with plantings of native tree and shrub species within the affected area.